

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

-against-

1:18-cr-00340 (LGS)

SOHRAB "Sam" SHARMA,
RAYMOND "Ray" TRAPANI,
and ROBERT "RJ" FARKAS,

Defendants.

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**DECLARATION OF LAUREN BOWMAN IN SUPPORT OF DEFENDANT SOHRAB
"SAM" SHARMA'S MOTION *IN LIMINE* TO PRECLUDE THE GOVERNMENT
FROM OFFERING EVIDENCE OF UNCHARGED ACTS AND PRIOR
CONVICTIONS PURSUANT TO FEDERAL RULES OF EVIDENCE 404(b) AND 609**

I, Lauren Bowman, declare under penalty of perjury as follows:

1. I am a member of the law firm of Goodwin Procter LLP, attorneys for Defendant Sohrab Sharma in this action. I have personal knowledge of and am familiar with the facts and circumstances set forth herein by virtue of both my representation of Mr. Sharma and my review of the case file in this action.

2. Attached hereto as Exhibit A is a true and correct copy of a letter dated July 22, 2019 from Assistant U.S. Attorney's Samson Enzer and Negar Tekeei to counsel for Mr. Sharma, notifying Mr. Sharma of evidence the Government expects to admit pursuant to Federal Rule of Evidence 404(b).

3. Attached hereto as Exhibit B is a true and correct copy of the Certificate of Disposition, No. 119951, for Mr. Sharma's conviction for violation of Vehicle and Traffic Law Section §

1192.3, for *The People of the State of New York v. Sohrab Sharma*, (Dkt. No. 2016NY020228), dated October 7, 2019.

4. Attached hereto as Exhibit C is a true and correct copy of the Certificate of Disposition Indictment, No. 67505, for Mr. Sharma's conviction for violation of Penal Law § 210.15, for *The People of the State of New York v. Sohrab Sharma*, Case No. 03159-2017, dated October 8, 2019.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2019
New York, NY

/s/ Lauren Bowman
Lauren Bowman
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
lbowman@goodwinlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 11, 2019, a true and correct of the forgoing was furnished by electronic delivery to all counsel of record.

/s/ Lauren Bowman
Lauren Bowman
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